

# **EXHIBIT C**

**IN THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN DISTRICT  
OF GEORGIA ATLANTA DIVISION**

<b>DONNA CURLING, ET AL.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>CIVIL ACTION</b>
<b>vs.</b>	)	
	)	<b>FILE NO. 1:17-cv-2989-AT</b>
<b>BRAD RAFFENSPERGER,</b>	)	
<b>ET AL.,</b>	)	
	)	
<b>Defendants.</b>	)	

**NOTICE OF RULE 34 REQUEST FOR  
EXPEDITED INSPECTION AND  
COPYING**

Pursuant to Rule 34(a) of the Federal Rules of Civil Procedure, Coalition Plaintiffs request the Defendant Fulton Board (i.e., members of the Fulton County Board of Registration and Elections) (1) to produce and permit the Coalition Plaintiffs to inspect, copy, test, or sample the items in the Defendants' possession, custody, or control that are set out herein; and (2) to permit entry onto the designated land or other property possessed or controlled by the Fulton Board identified herein so that the Coalition Plaintiffs may inspect, measure, survey, photograph, test or sample the property or any designated object or operation on it as set out herein.

The following operations occurring at the following indicated times and

places and the following records related to the August 11, 2020 election are subject of this Request:

Items and Operations to be Inspected, Copied, Tested

1. Inspect and copy the voting equipment precinct delivery schedule on August 4, 2020, at 10 am at the Fulton County English Street facility.
2. Inspect and observe the subsequent operations comprising physical delivery and installation of voting equipment in up to 5 polling places selected by Coalition representative at the time of Fulton's delivery and installation activity.
3. Inspect and observe the operations comprising mail ballot scanning and processing activities, including (1) inspection and copying of all electronic documents generated or subject to review in the conduct of such activities, (2) observation of operations comprising adjudication and remaking of ballots by the Vote Review Panel on August 10, 2020 through August 12 (or until completion) at the time and place the Review Panel's activities take place.
4. Inspect and copy digital printouts of, and observe, Auditmark ballot images (with color overlays) flagged for review by the Ballot Review Panel and ballot images not flagged for review. Such printouts to include the Auditmark interpretations made on each ballot image,

including interpretations made by the Ballot Review Panel.

5. Inspection of the mail ballot scanner settings and software threshold settings related to detection and recording of ballot marks on hand marked ballots during the scanning of mail ballots beginning August 10, 2020 and continuing through August 12, 2020 (or until complete) at the Fulton County location where such scanning activities occur.
6. Plaintiffs' test of mail ballot scanner and adjudication software accuracy by Plaintiffs' representatives. Test will be conducted by Plaintiffs' representatives hand marking 50 blank ballots to be supplied by Fulton made up of a variety of ballot styles. Testing will include a tabulation of the test ballots on a mail ballot scanner and a review and copying or digital printouts of the resulting ballot images, as well as a review of the on screen adjudication results of the 50 ballot test batch.
7. Inspect and observe operations comprising precinct scanning of ballots in 02J, 03A, 06L1, 02C and 10C precincts on August 11, 2020 during voting hours. Observation to include observation of electronic information displays on the scanners, and scanner settings. Individual voter's ballots are not subject to inspection during the voter's active voting and ballot casting process.
8. Inspect and observe operations comprising precinct opening and closing,

including the production of all electronic or paper reports prepared by election officials at 02J, 03A, 06L1, 02C and 10C precincts on August 11, 2020, and inspection and copying of all precinct recap and Pollpad reports as soon as they are available on August 12 or 13.

9. Inspect and observe operations comprising start-up and operation of the PollPads including voter check-in and voter access card encoding procedures, and paper ballot lists at the 02J, 03A, 06L1, 02C and 10C precincts on August 11, 2020.
10. Inspect and observe operations comprising start-up and operation of the ballot marking device units at the 02J, 03A, 06L1, 02C and 10C precincts on August 11, 2020, including the inspection of all on screen messages and displays. All such inspections will occur when no voter is using the specific ballot marking device being inspected.
11. Inspect and observe operations comprising ePulse (dashboard) Election Day reporting and monitoring function of the county-wide deployed KnowInk Pollpads' operation on August 11, 2020 at the Fulton County office where the monitoring software is installed, and digital printouts of all logs uploaded for Election Day for PollPads and logs for the PollPad system.
12. Inspect and copy the training materials for the Dominion Voting System

ballot adjudication function, and all communications between Fulton County and the Secretary of State related to the use of the Dominion adjudication software including scanner threshold settings. Inspection to take place at 9:30 am on August 10, 2020 at the Fulton office in which materials are available.

13. Inspect and observe operations comprising delivery and uploading to the EMS server all memory devices used in the August 11 election, and the tabulation and report-writing activities on election night. Inspection to include uploading of election data to the Election Night Reporting system, and election night visibility to both ePulse and iTrack interfaces for the PollPad system. Inspection to occur beginning after 5pm on August 11 and continuing from time to time as Fulton completes the uploading of all August 11 election data.

14. Inspect and copy materials created or used in Logic and Accuracy Testing of voting system equipment for the August 11 election, including but not limited to instructions, test scripts, ballots printed, and tabulation results. Inspection to take place at 1pm on August 10 at Fulton's English Street facility.

15. Inspect and copy the polling place voting system equipment allocation worksheet for the August 11, 2020 election.

16. Inspect and observe operations comprising mail ballot envelope and mail ballot application signature verification processing, including security controls beginning at 11am on August 10 and continuing from time to time as Fulton undertakes such activities.

Conditions for Inspection

- A. Plaintiffs will give Fulton counsel at least 24 hours' notice of the names and contact information of representatives authorized to conduct the inspections.
- B. Parties will cooperate to share and update times and places of election activities to be inspected and the inspection schedule given the fluid nature of election activities.
- C. For each inspection activity, Coalition Plaintiffs' representatives will be permitted to have one inspector knowledgeable of the voting system and one representative assisting and documenting the inspection work.
- D. Photographs, video, electronic and paper copies and printouts of all documents related to activities and records inspected are permitted to the extent that they do not contain personal identifying information.
- E. Inspection and observation include adequate visual access to the activities and documents to read screens or paper documents similar to the level of visual access of the officials conducting the activities.

F. Plaintiffs' representatives shall be subject to the same confidentiality and non-disclosure agreements required of the officials conducting the activities observed or inspected.

Dated July 31, 2020

Respectfully submitted,

/s/ Bruce P. Brown

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2020, I served a copy of the foregoing upon counsel for the Defendants via electronic mail.

/s/ Bruce P. Brown  
Bruce P. Brown